

1 WALTER H. SWAYZE III, ESQ. (*pending pro hac vice*)

Pennsylvania Bar No. 0059101

Pete.Swayze@LewisBrisbois.com

LEWIS BRISBOIS BISGAARD & SMITH LLP

550 E. Swedesford Road, Suite 270

Wayne, PA 19087

TEL: (215) 977-4089

FAX: (215) 977-4101

5 DARRELL D. DENNIS, ESQ.

6 Nevada Bar No. 006618

Darrell.Dennis@lewisbrisbois.com

7 LEWIS BRISBOIS BISGAARD & SMITH LLP

6385 S. Rainbow Boulevard, Suite 600

8 Las Vegas, Nevada 89118

TEL: 702.893.3383

9 FAX: 702.893.3789

10 BRANDON D. WRIGHT, ESQ.

Nevada Bar No. 13286

Brandon.Wright@lewisbrisbois.com

LEWIS BRISBOIS BISGAARD & SMITH LLP

12 5555 Kietzke Lane, Suite 200

Reno, Nevada 89511

13 TEL: 775.827.6440

FAX: 775.827.9256

14 *Attorneys for Defendants*, BIOMET, INC.,

BIOMET ORTHOPEDICS, LLC, F/K/A

15 BIOMET ORTHOPEDICS, INC., DJO

GLOBAL, INC.; and ENCORE MEDICAL,

16 L.P. D/B/A DJO SURGICAL

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA, NORTHERN DIVISION

20 DEBRA GREGOIRE,

21 Plaintiffs,

22 vs.

23 BIOMET, INC., BIOMET ORTHOPEDICS,
24 LLC, F/K/A BIOMET ORTHOPEDICS,
INC., DJO GLOBAL, INC.; and ENCORE
25 MEDICAL, L.P. D/B/A DJO SURGICAL,
and DOES 1 500,

26 Defendants.

CASE NO. 3:20-cv-00077-MMD-CLB

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO PLAINTIFF'S FIRST
AMENDED COMPLAINT

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1 The parties, by and through their undersigned counsel of record, hereby stipulate
2 and agree that the time for Defendants BIOMET, INC., BIOMET ORTHOPEDICS, LLC,
3 F/K/A BIOMET ORTHOPEDICS, INC., DJO GLOBAL, INC. and ENCORE MEDICAL,
4 L.P. D/B/A DJO SURGICAL to file their response to Plaintiffs' Amended Complaint, be
5 extended until May 29, 2020.

Reason for Extension

7 Because of the limitations and challenges presented by CV-19 and the complexity
8 and extent of the allegations and claims made in Plaintiffs' Amended Complaint,
9 Defendants BIOMET, INC., BIOMET ORTHOPEDICS, LLC, F/K/A BIOMET
10 ORTHOPEDICS, INC., DJO GLOBAL, INC.; and ENCORE MEDICAL, L.P. D/B/A DJO
11 SURGICAL require additional time to perform an investigation prior to filing their
12 responsive pleading and to respond accordingly. This stipulation is made in good faith
13 and not for the purpose of delay.

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1 This is the first extension of time requested by counsel for filing Defendants
2 response to Plaintiffs' Amended Complaint.

3 DATED this 27th day of May, 2020.

DATED this 27th day of May, 2020.

4 LEWIS BRISBOIS BISGAARD & SMITH

HUTCHISON & STEFFEN, PLLC.

5 /s/ Darell D. Dennis

6 DARRELL D. DENNIS, ESQ.
7 Nevada Bar No. 006618
8 6385 S. Rainbow Boulevard, Suite 600
9 Las Vegas, Nevada 89118

/s/ Devon T. Reese

DEVON T. REESE,
Nevada Bar No. 7496
JASON D. GUINASSO,
Nevada Bar No. 8478

9 BRANDON D. WRIGHT, ESQ.
10 Nevada Bar No. 13286
11 5555 Kietzke Lane, Suite 200
12 Reno, Nevada 89511

ALEX R. VELTO,
Nevada Bar No. 14961
500 Damonte Ranch Parkway, Suite 980
Reno, Nevada 89521

13 WALTER H. SWAYZE III, ESQ.
14 (*pending pro hac vice*)
15 Pennsylvania Bar No. 0059101
16 550 E. Swedesford Road, Suite 270
17 Wayne, PA 19087

Attorneys for Plaintiff DEBRA GREGOIRE

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1 ORDER
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IT IS SO ORDERED.

Dated this 27th day of May 2020.



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